IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

STATE OF NEW YORK, et al., Plaintiffs, NEW YORK IMMIGRATION COALITION, et al., Consolidated Plaintiffs v. UNITED STATES DEPARTMENT OF COMMERCE, et al., Defendants.	Civil Action No. 1:18-cv-2921-JMF

SUPPLEMENTAL AFFIDAVIT OF MARCHELLE FRANKLIN

Pursuant to 28 U.S.C. § 1746, I, Marchelle Franklin, hereby declare as follows:

1. As explained in my October 31 Affidavit, I am the Human Services Director for the City of Phoenix, Arizona, where I have been employed since 2002. My previous roles include serving as Interim Human Services Director, Director of the Police Department's Community Affairs Division, and Chief of Staff for former Mayor Phil Gordon. All of the statements made in my October 31 Affidavit and in this Affidavit are made based on my personal knowledge, acquired as part of my work for Phoenix. As Human Services Director, part of my work includes overseeing the federally-funded social services programs. Accordingly, my work requires me to keep apprised of federal grant programs that provide money to Phoenix.

2. As Director of Human Services, I have become familiar with the operations and funding requirements of several federal grant programs, including Victims of Crime Act ("VOCA") Funds, Temporary Assistance for Needy Families ("TANF") Funds, Low-Income

Home Energy Assistance ("LIHEAP") Funds, Head Start Funds, and Workforce Innovation and Opportunity Act ("WIOA") Funds. During the course of my work I have also become familiar with the formulas by which these federal funds are allocated to the State of Arizona and ultimately to Phoenix. Because I oversee these programs, I am aware of the kinds of services these programs provide to Phoenix residents. As Director of Human Services, I am uniquely positioned to have oversight of these four federal funding sources that are predicated in part on decennial census data.

3. As Director of Human Services, I regularly participate in meetings with staff who directly oversee and administer the four programs discussed in paragraph 2 and in my October 31 Affidavit. During those meetings, we have discussed how Phoenix's eligibility and allotment of grant funds are determined, as described in paragraphs 6 through 10 of my October 31 Affidavit. I quickly came to understand during the course of my work with these programs that a decrease in Phoenix's population count will lead to a decrease in its share of the federal funding for these programs. And I understand – based on my professional experience – that the population data used in applying these formulas is obtained from the Census Bureau.

4. When preparing my October 31 Affidavit, I confirmed the specific funding amounts Phoenix receives for the social services grant programs discussed therein, each of which are predicated at least in part on decennial census data. I then confirmed these funding numbers with available public records and with my City of Phoenix colleagues who administer these programs. I specifically verified the grant amounts discussed in paragraphs six through ten of my October 31 Affidavit in this manner.

5. My experience overseeing these programs forms the basis for my understanding that a decrease in Phoenix's population count will lead to a decrease in its share of these federal

social service grants. I also understand that a decrease in the overall federal funds allocated to Arizona for these programs will lead to a decrease in the amount passed through to Phoenix.

6. As I explained in my October 31 Affidavit, decreases in Phoenix's share of these federal dollars would result in reductions of critical social services.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: November 3, 2018

Phoenix, AZ

[signature]

Marchelle Franklin